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Attorneys for Defendants **JOSE ZAVALA and**
JULIO QUINTANILLA

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARGARITO T. LOPEZ,
SONIA TORRES, KENI
LOPEZ, ROSY
LOPEZ,

Plaintiffs,

v.

CITY OF LOS ANGELES, JOSE
ZAVALA, JULIO QUINTANILLA,
AND DOES 1 THROUGH 10,
INCLUSIVE,

Defendants.

CASE NO. 2:22-cv-07534-FLA-MAAx

[Assigned to Judge Fernando L. Aenlle-Rocha, USDC-
Hon. Mag. Maria A. Audero, USDC-Roybal Bldg]

**DECLARATION OF MUNA BUSAILAH
IN SUPPORT OF DEFENDANTS'
NOTICE OF MOTION AND MOTIONS
IN LIMINE NUMBERS 1 THROUGH 5**

[Filed concurrently with Declaration of
Muna Busailah to Motions *in Limine* No. 1,
No. 2, No. 3, No. 4 and No. 5; Exhibits A-C;
[Proposed] Order]

FPTC: May 31, 2024
TIME: 1:00 PM
DEPT: 6B, 6th Floor

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1 I, MUNA BUSAILAH, declare:

2 1. I am an attorney, duly licensed to practice before this Court and all courts of
3 the State of California. I am a partner with the firm of Stone Busailah, LLP, the
4 attorney of record for Defendants Jose Zavala and Julio Quintanilla in this case. I
5 have personal knowledge of, and could and would testify competently to the
6 matters set forth herein.
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9 2. On May 19, 2023, I caused the Defendants' Designation of Expert Witnesses
10 to be served on Plaintiff's counsel by email. The Designation included the
11 curriculum vitae and fee schedules for experts Edward Flosi and Ronald Kvitne.
12 The Designation also identified the areas of testimony for both experts.
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14 3. On May 25, 2023, Plaintiff served objections to Defendants' Expert Witness
15 Disclosures.
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17 4. The same day, on May 25, 2023, I caused the Defendants' Supplemental
18 Designation of Expert Witnesses to be served on plaintiff's counsel. The
19 Supplemental Disclosures included the expert reports of Edward Flosi and Ronald
20 Kvitne as Exhibits A and B, respectively.
21

22 5. Rebuttal expert disclosure deadline was June 2, 2023. The expert discovery
23 cut-off date was June 23, 2023, nearly a month after Plaintiff served objections to
24 defendants' supplemental disclosures. Plaintiff claims he was "prejudiced in his
25 ability to conduct expert discovery and potentially serve a rebuttal designation", but
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1 has made no effort to meet and confer to seek additional time in order to designate a
2 rebuttal expert nor has he sought to conduct expert discovery.

3
4 I declare under penalty of perjury under the laws of the State of California
5 and the United States of America that the foregoing is true and correct.
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7 Executed on May 3, 2024, at Pasadena, California.
8

9 /s/ Muna Busailah

10 MUNA BUSAILAH, Declarant
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